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22 *Attorneys for Defendant JAMES P. DORAN*

23 UNITED STATES DISTRICT COURT

24 DISTRICT OF NEVADA

25 BROOK M. HURD, GERALDINE C. HURD,  
AND M.H., A MINOR, BY AND THROUGH  
26 HER GUARDIAN AD LITEM, BROOK M.  
HURD; LUIS O. VILLALOBOS; OLIVIA N.  
ESPINOZA; AND L.M.V., A MINOR, BY AND  
THROUGH HIS GUARDIAN AD LITEM  
OLIVIA N. ESPINOZA;

27 Plaintiffs,

v.

28 CLARK COUNTY SCHOOL DISTRICT,  
JAMES P. DORAN, SHAWN PAQUETTE,  
AND KRISTY KELLER

Defendants.

Case No. 2:16-cv-02011-GMN-NJK

29 **STIPULATION AND  
[PROPOSED] ORDER TO MODIFY THE  
SCHEDULING ORDER  
[THIRD REQUEST]**

1           WHEREAS, on March 2, 2018 the parties filed a Joint Stipulation and Proposed Order to  
2 Modify the Scheduling Order (ECF Doc. 109) and the Order was signed by this Court on March  
3 7, 2018 (ECF Doc. 110); and

4           WHEREAS, the Order extended the deadline for the Supplemental Reports of Plaintiffs'  
5 Experts to April 13, 2018; and

6           WHEREAS, the Order continued the deadline for the Supplemental Rebuttal Reports of  
7 Defendants' Experts to April 27, 2018; and

8           WHEREAS, the Order continued the deadline by which Expert Depositions must be  
9 completed to May 25, 2018; and

10          WHEREAS, the Order continued the deadline by which Dispositive Motions must be  
11 filed to June 22, 2018; and

12          WHEREAS, the parties just concluded the depositions of Defendant CCSD's 30(b)(6)  
13 witnesses on March 19, 2018; and

14          WHEREAS, the experts for the parties have received the transcripts from twenty-eight  
15 (28) depositions since their original reports were prepared and require additional time to review  
16 and consider the testimony and prepare supplemental reports; and

17          WHEREAS, counsel for plaintiffs Marianne Lannuti has a prepaid vacation and is  
18 scheduled to be out of the country from April 8, 2018 through April 25, 2018; and

19          WHEREAS, counsel for plaintiffs Peter Alfert has a prepaid vacation and is scheduled to  
20 be out of the country from May 1, 2018 to May 19, 2018;

21          IT IS HEREBY STIPULATED by and between the parties to the above-entitled action  
22 that the deadlines are briefly extended as follows:

- 23          1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two  
24 (2) weeks to April 27, 2018;
- 25          2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be  
26 extended by two (2) weeks to May 11, 2018;
- 27          3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to  
28 June 8, 2018;

1       4. The deadline for Dispositive Motion shall be extended by four (4) weeks to July 20,  
2       **2018;**

3       Date: March 27, 2018

4       LAW OFFICES OF PETER W. ALFERT

5       By: s/ Peter W. Alfert  
6           PETER W. ALFERT  
7           IAN A. HANSEN  
8           Attorneys for Plaintiff

9       Date: March 27, 2018

10      LAW OFFICES OF MARIANNE C. LANUTI

11       By: s/ Marianne C. Lanuti  
12           MARIANNE C. LANUTI  
13           Attorneys for Plaintiff

14       Date: March 27, 2018

15      GREENBERG TRAURIG

16       By: s/ Kara B. Hendricks  
17           KARA B. HENDRICKS  
18           Attorneys for Defendants Clark County School  
19           District, Shawn Paquette, and Kristy Keller

20       Date: March 27, 2018

21      HATFIELD & ASSOCIATES

22       By: s/ Trevor J. Hatfield  
23           TREVOR J. HATFIELD  
24           Attorneys for James P. DORAN

25       Date: March 27, 2018

26      HALL, JAFFE & CLAYTON LLP

27       By: s/ Michelle R. Schwarz  
28           STEVEN T. JAFFE  
29           MICHELLE R. SCHWARZ  
30           Attorneys for Defendants Clark County School  
31           District, Shawn Paquette, and Kristy Keller

## [PROPOSED] ORDER

Pursuant to the Stipulation of the Parties, and good cause appearing, the following deadlines are briefly extended as follows:

1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two (2) weeks to April 27, 2018;
2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be extended by two (2) weeks to May 11, 2018;
3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to June 8, 2018;
4. The deadline for Dispositive Motion shall be extended by four (4) weeks to July 20, 2018;

**IT IS HEREBY ORDERED**

Dated: April 2, 2018

Terry A. Dean  
UNITED STATES MAGISTRATE JUDGE